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**Environmental Stewardship** — **Environmental Characterization and Remediation** 

**Quality Procedure** 

for Readiness Planning and Review for non-Nuclear Environmental Sites

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## **Revision Log**

Date	Prepared By	Description of Changes	Affected Pages
08/25/99	John L. Day	New Procedure	All
11/28/00	Andrew E. Gallegos	Revised to address format and process requirement changes	All
04/25/01	Andrew E. Gallegos	Revised format, inserted a revision log page, revised training requirements, added a section to address lessons learned, added a section to address waste management process requirements, and revised checklist to reflect these changes.	Pages 2, 3, 5, 7, 8, 14, and 19
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7/16/02	David Hawkinson	Clarify personnel responsibilities.	Pages 6, 10
12/5/02	Andrew E. Gallegos	Add to SCOPE, incorporate information on Facility Hazard Categorization to comply with LANL LIRs, make organizational changes, update checklist.	Pages 4, 8,11,12, Attachments A & B
11/1/05	Matt Riggs	Procedure Title Change. Remove extraneous material related to past operations and to correct new names and office titles. Incorporated new changes to Checklist and streamlined procedure.	All
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# Readiness Planning and Review for non-Nuclear Environmental Sites

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## **List of Acronyms and Abbreviations**

AR administrative requirement

AOC area of concern

DOE U.S. Department of Energy

ECO Ecology Group

ECR Environmental Characterization and Remediation Group

ENV Environmental Stewardship Division
EPA U.S. Environmental Protection Agency

ERS Environmental Remediation and Surveillance Program

H&S health and safety
HASP health and safety plan
IMP implementation procedure
IWD integrated work document
IWP installation work plan
JHA Job Hazard Analysis

LANL Los Alamos National Laboratory (or the Laboratory)
LASO Department of Energy Los Alamos Site Office

LIG Laboratory Implementation Guidance
LIR Laboratory Implementation Requirements
LPR Laboratory Performance Requirements

LS Laboratory Standard

MAQ Meteorology and Air Quality Group MSA management self assessment

NCB NEPA, Cultural Resources, and Biological Resources

NEPA National Environmental Policy Act

NESHAP National Emission Standards for Hazardous Air Pollutants

NMED New Mexico Environment Department NNSA National Nuclear Security Administration

NPDES National Pollutant Discharge Elimination System

OST operations support tool

PL project leader

PR ID permits and requirements identification

QII quality integration and improvement

QP quality procedure

QPPL quality program project leader

RAD radiological

RCRA Resource Conservation and Recovery Act

RFI RCRA facility investigation responsible line manager RLM **RPF** Records Processing Facility SAP Sampling and Analysis Plan Sample Management Office SMO SOP standard operating procedure SSHASP site-specific health and safety plan SWMU solid waste management unit

SWPPP Storm Water Pollution Prevention Plan SWRC Solid Waste Regulatory Compliance Group WCSF Waste Characterization Strategy Form WMC Waste Management Coordinator

WQH Water Quality and Hydrology Group

## Readiness Planning and Review for non-Nuclear Environmental Sites

### 1.0 PURPOSE

This quality procedure (QP) states the responsibilities and describes the process for identifying, sequencing, and scheduling all applicable and relevant activities and logistics associated with fieldwork to ensure compliance with applicable Los Alamos National Laboratory (LANL), local, state, and Federal procedural requirements, standards, and regulations, including those of the Environmental Stewardship (ENV) Division–Environmental Characterization and Remediation (ECR) Group regarding quality, health, safety, security, and the environment. The readiness review process described in this procedure is to ensure compliance with identified requirements, to document consensus that fieldwork may proceed, and to ensure that the associated activities are closed or scheduled appropriately.

#### 2.0 SCOPE

- 2.1 All **Participants** shall implement this mandatory QP when preparing for and conducting readiness reviews prior to fieldwork (at non-Nuclear Environmental Sites) for ENV-ECR.
- 2.2 **Participants** shall use the process described in this QP as a planning tool to prepare for fieldwork, as well as to ensure compliance to all identified requirements, and to gain consensus that key preparatory activities are complete and fieldwork may proceed.
- 2.3 This procedure meets the requirements and intent of Management Self Assessment (MSA), as defined in Laboratory Implementation Requirement (LIR) 300-00-08, Startup/Restart of Laboratory Facilities/Activities, as applicable to routine Environmental Remediation and Surveillance (ERS) Program work. Work that falls outside the scope of routine ERS work, such as activities falling into a nuclear hazard category of 2 or 3, or non-nuclear hazard category of A or B, as defined in LIR 300-00-05, Facility Hazard Categorization, must meet the additional requirements of LIR 300-00-08 and QP-5.18, Readiness Review and Planning for Nuclear Environmental Sites.

## 3.0 TRAINING

- 3.1 **Participants** shall train to (e.g., reading and/or live training) and use the current version of this QP; contact the author of this QP if the text is unclear.
- 3.2 **Participants** shall document training to this procedure in accordance with QP-2.2, Personnel Training Management.

- 3.3 The responsible **project leader (PL)** shall monitor the proper implementation of this procedure for their assigned work and activities.
- 3.4 The responsible **team leader** shall ensure that the appropriate personnel complete all applicable training assignments as per QP-2.2, Personnel Training Management.

#### 4.0 **DEFINITIONS**

- 4.1 chairman—A participant assigned the responsibility of implementing the requirements as addressed in this QP, and facilitating the readiness planning and review meeting. When required the chairman is responsible for verifying the completion of the readiness planning review process by signing Block 14 of Attachment B, Readiness Planning and Review Checklist.
- 4.2 *nuclear environmental site*—Inactive waste handling or disposal areas that have been characterized as nuclear sites because, based on initial categorization, their inventory identified them as hazard category 2 or 3 according to DOE-STD-1027 thresholds.
- 4.3 objective evidence—Any documented statement of fact, other information, or record, either quantitative or qualitative, pertaining to the quality of an item, sample, or activity based on measurements, tests, or observations that can be verified. May be an e-mail, a memo, or copies of documentation specific to the activity or item.
- 4.4 Readiness Planning and Review Checklist—An itemized guide for verifying compliance to identified requirements and to obtain a consensus of readiness to commence fieldwork.
- 4.5 Solid Waste Regulatory Compliance (SWRC) representative—A participant responsible for providing regulatory compliance support during the readiness planning and review process. Also reviews and assists PL with notifications to the New Mexico Environment Department (NMED) at least fifteen calendar days before the start of sampling activities and/or work plan implementation. The SWRC representative along with the PL also determines if a "proceed at risk "process is warranted when review and approval of work plans and/or sampling and analysis plans are not completed by NMED.
- 4.6 Sample Management Office (SMO) lead—A participant of the SMO responsible for ensuring all applicable sample collection logs and field chain-of-custody forms necessary for the planned sampling event(s) are generated and available. The SMO lead is also responsible for notifying and scheduling the radiological (RAD) counting laboratory when the services of the RAD laboratory are required.

#### 5.0 RESPONSIBLE PERSONNEL

The following personnel are responsible for activities identified in this procedure:

- chairman
- communications and outreach specialist
- participants
- project leader
- quality program project leader
- quality specialist
- responsible line manager
- SWRC representative
- safety basis reviewer
- SMO lead
- team leader
- training specialist

#### 6.0 PROCEDURE

- 6.1 Determine Need for Readiness Planning and Review Meeting
  - 6.1.1 The **PL** shall determine the need for a meeting if one or more of the criteria listed below are determined to apply:
    - Fieldwork activities require assessment for hazards and other vulnerabilities (e.g., environmental, radiological, mission importance, cost/benefit, worker/public safety, and/or security).
    - The formality and documentation rigor is such that it requires the involvement of other organizations (e.g., NMED, U.S. Environmental Protection Agency [EPA], LANL Health Safety and Radiation Protection [HSR], ENV-ECR Quality Integration and Improvement [QII] quality specialist, etc.) for review and approval.
    - Changes in work activities, expectations, hazards, tenants, and/or facility conditions that could affect the operating parameters or requirements need formal identification and assessment.
    - 48 CFR (DEARA) 970.2303-2(a) requirement to confirm readiness for operations to be initiated and conducted is established and agreed-upon applies.
    - Required compliance to LA-UR-98-2837, Integrated Safety Management Description Document, Rev 3, Section 6.1,

Confirming Readiness, (located at Official Documents inside Los Alamos National Laboratory) and Laboratory Implementation Requirement (LIR) 300-00-01, Safe Work Practices.

- 6.1.2 If one of the criteria from above is applicable, perform readiness planning
- **Note:** The **PL**, **designee**, **or chairman** shall <u>not</u> schedule a readiness planning and review meeting if the requirements of Sections 6.2, 6.3, and 6.4 have not been completed.

These responsible personnel shall take into consideration those activities that require sufficient lead-time for development, review, and approval (e.g., permits and requirements identification [PR ID], site-specific health and safety plan [SSHASP], excavation permits, waste characterization strategy forms [WCSF], readiness review, and applicable plans).

- 6.2 Perform Readiness Planning
  - 6.2.1 The **PL**, **designee**, **or chairman** shall provide the ENV-ECR QII quality specialist representative an approved copy of the applicable statement of work, any applicable plans, and information identifying procedures used by field personnel.
    - 6.2.1.1 The **PL** and quality specialist will verify that the procedures that will be used are current and not expired.
  - 6.2.2 The **PL**, **designee**, **or chairman** shall provide the field team and the SMO Lead a copy of the Sampling and Analysis Plan (SAP).
  - 6.2.3 The PL, designee, or chairman shall provide the communications and outreach specialist with information that identifies the proposed fieldwork. The communications and outreach specialist will use this information to develop a press release or to inform, as necessary, Los Alamos County, non-Department of Energy (DOE) property owners, and the public.
  - 6.2.4 The **PL**, **designee**, **or chairman** shall schedule a tabletop analysis with the Training Specialist to develop a training plan matrix. The PL shall ensure that subject-matter experts, the scope of work, and all applicable plans along with a list of employees is available for the meeting.
  - 6.2.5 The **PL**, **designee**, **or chairman** shall give the SWRC representative a copy of work documents that have a regulatory compliance component, which may include, but are not limited to, the approved work plan, a copy of the approval letter from NMED, the WCSF, and the applicable statement of work. Also, provide comments on the PR ID if applicable to the SWRC representative.

- 6.2.6 The **PL**, **designee**, **or chairman** shall discuss the planned activities with the safety basis reviewer to ensure that planned activities do not affect Nuclear Environmental Sites.
- 6.2.7 The PL, designee, or chairman shall collect required documentation identified in the Readiness Planning and Review Checklist and make it available for the readiness planning and review meeting.
- 6.3 Perform Assigned Tasks
  - 6.3.1 The **PL**, **designee**, **or chairman** shall complete the Readiness Planning and Review Checklist.
  - **Note:** The Readiness Planning and Review Checklist Completion Instructions in Attachment A are provided as a guide to help fill out the checklist. Use of these instructions is not required as part of this procedure.
    - 6.3.1.1. Determining if the activity description is applicable, deferred, or not applicable.
    - 6.3.1.2. Assigning the activity to an individual.
    - 6.3.1.3. Ensuring that the activity is completed and verified by a second individual in the appropriate area.
    - 6.3.1.4. Entering a date when the activity is closed or accomplished.

**Note:** Date closed cannot be later than the readiness review meeting.

- 6.3.2 The **PL**, **designee**, **or chairman** shall put together the readiness review files. All documentation shall be available at the readiness review meeting for any participant to verify. Examples of items in the readiness review file include the following:
  - copies of training documentation
  - · PR ID and comments
  - · memos to file
- 6.3.3 The **PL or designee** shall notify the NMED, DOE-NNSA LASO and/or the EPA at least fifteen calendar days before the start of sampling activities and/or work plan implementation.
- 6.4 Notify Attendees of Readiness Planning and Review Meeting

The **PL**, **designee or chairman** shall notify appropriate individuals listed in the notifications section of the readiness review checklist, and any appropriate individuals determined by the PL or chairman of the location, date, and time of the readiness planning and review meeting. If possible, notify attendees at least one week prior to scheduled meeting.

- 6.5 Conduct the Readiness Planning and Review Meeting
  - The **PL**, **designee**, **or chairman**, shall chair the readiness planning and review meeting and do the following:
  - 6.5.1 Circulate a Readiness Planning and Review Meeting Attendance List and ensure that attendees sign. (See Attachment C).
  - 6.5.2 Provide attendees a brief overview of the project.
  - 6.5.3 Provide each meeting attendee with a copy of a Readiness Planning and Review Checklist (Attachment B) that demonstrates appropriate and required information.
  - 6.5.4 Review the Readiness Planning and Review Checklist and obtain the appropriate information from the meeting attendees for verifying the completion of assigned tasks (i.e., complete the checklist).
    - 6.5.4.1 Verification shall be accomplished by reviewing all applicable information (e.g., permits, waste management documents, training completion) and by the responsible participant entering a signature in the applicable Readiness Planning and Review Checklist block (See Attachment B).
  - 6.5.5 Upon the completion of the checklist, the PL shall have the PL, designee, or chairman; the quality specialist, the SMO lead; the training specialist; the SWRC representative; the safety basis reviewer; and the RLM sign the checklist.
  - **Note:** Fieldwork shall not begin until all applicable sections of the checklist are satisfied and signed off.
  - **Note:** Training for personnel arriving to do work on any ENV-ECR site—post readiness review—will be performed per QP-2.2, Personnel Training Management.

#### 7.0 LESSONS LEARNED

- 7.1 Before performing work described in this QP, **participants** should go to the DOE Lessons Learned Information Services home page, located at <a href="http://www.tis.eh.doe.gov/ll/ll.html">http://www.tis.eh.doe.gov/ll/ll.html</a>, and/or to the Laboratory's Lessons Learned Resources web page, located at <a href="http://www.lanl.gov/projects/lessons\_learned/">http://www.lanl.gov/projects/lessons\_learned/</a>, and search for applicable lessons.
- 7.2 During work performance, and/or after the completion of work activities, **participants**, as appropriate, shall identify, document, and submit lessons learned in accordance with the Laboratory's Lessons Learned System located at <a href="http://www.lanl.gov/projects/lessons\_learned/">http://www.lanl.gov/projects/lessons\_learned/</a>.

#### 8.0 RECORDS

The **PL**, **designee**, **and/or chairman** shall submit the following records to the Records Processing Facility, in accordance with QP-4.4, Record Transmittal to the Records Processing Facility:

- completed Readiness Planning and Review Checklist and all supporting documentation
- completed Readiness Planning and Review Meeting Attendance List

#### 9.0 REFERENCES

To properly implement this QP, **participants** should become familiar with the references used to develop this QP, which include the following (available at <a href="http://erinternal.lanl.gov/home\_links/Library\_proc.shtml">http://erinternal.lanl.gov/home\_links/Library\_proc.shtml</a>):

- ENV-ERS Quality Management Plan
- QP-2.1, Personnel Qualification and Selection Process
- QP-2.2, Personnel Training Management
- QP-3.5, Peer Review Process
- QP-4.4, Record Transmittal to the Records Processing Facility
- QP-4.5, Document Control
- QP-5.4, Obtaining Access Agreements for Non-DOE-Owned Property
- QP-5.12, Integrating Work with Other Organizations
- QP-5.18, Readiness Review and Planning for Nuclear Environmental Sites
- SOP-01.03, Handling, Packaging and Transporting Field Samples
- SOP-01.04, Sample Control and Field Documentation
- SOP-01.06, Management of Environmental Restoration Project Wastes
- SOP-01.10, Waste Characterization

**Note:** Director's Instruction, Notices, ISM Description Document and LIRs may be found at <a href="http://int.lanl.gov/documents">http://int.lanl.gov/documents</a>.

- LA-UR-98-2837, Integrated Safety Management Description Document, Section 6.1 Confirming Readiness
- Director's Instruction (DI) 04-004, Integrated Work Management Interim Process
- Site Wide Welding Operations Notice 0145 (LANL Engineering Standards Chapter 13- Welding)
- Implementation Procedure (IMP) 300-00-00, Integrated Work Management for Work Activities

- Laboratory Implementation Requirement (LIR) 210-01-01, Site and Project Planning
- LIR 230-03-01.5, Facility Management Work Control
- LIR 300-00-05, Facility Hazard Categorization
- LIR 300-00-07, Non-Nuclear Facility Safety Basis
- LIR 310-00-00, Conduct of Operations
- LIR 402-880-01.0, Soil Disturbance Permit Process
- LIR 402-810-01.0, Confined Spaces
- LIR 402-701-02, Radiological Access Control
- LIR 404-30-02.0, NEPA, Cultural Resources, and Biological Resources (NCB)
   Process
- LIR 404-00-02.2, General/Waste Management Requirements
- LIR 404-10-01.1, Air Quality Reviews
- LIR 404-50-01.0, Water Pollution Control
- LIR 300-00-01, Safe Work Practices
- LANL Operations Support Tool (OST) 310-00-00, Conduct of Operations
- 48 CFR Department of Energy Acquisition Regulations (DEARA) 970.2303-2(a)
- Laboratory Standard (LS) 105-01.0, Waste Management Coordinator Program
- Administrative Requirement (AR) 8-4, Welding, Cutting, and Other Spark-/Flame-Producing Operations

#### 10.0 ATTACHMENTS

The **participants** using this QP may locate all forms associated with this procedure at http://erinternal.lanl.gov/Quality/user/forms.asp.

Attachment A: Readiness Planning and Review Checklist Completion

Instructions (not required to complete this procedure, only a tool

in helping complete Attachment B.)

Attachment B: Readiness Planning and Review Checklist

Attachment C: Readiness Planning and Review Meeting Attendance List (1

page)

<u>Using a CRYPTOCard, click here to record self-study training to this procedure.</u>

If you do not possess a CRYPTOCard or encounter problems, contact the ENV-ECR training specialist.

#### Attachment A

Readiness Planning and Review Checklist Completion Instructions
(Note: This tool is not required to complete this QP, but is provided to help the participant complete the checklist.)

- Step 1 The PL or designee should develop a memorandum to the ENV/ECR Group Leader (e.g., Documentation of MSA as the Appropriate Level of Readiness Review) to address facility hazard categorization and the applicable management self-assessment performed. Attach memorandum as cover to Readiness Planning and Review Checklist and place in the readiness review files.
- Step 2 Complete the following Readiness Planning and Review Checklist header items:
  - Project Leader
  - Project Title
  - Readiness Planning and Review Meeting Date
  - Work Element

Provide a description of the Field Activity.

Step 3 Complete Checklist Sections 1 through 13.

Note: Unless specifically identified, the responsible **PL**, **designee**, and/or chairman shall assign participants the following activities (i.e., Checklist Sections 1 through 13).

- Preparatory activities that require completion before any fieldwork begins are identified by entering an A (designating applicable) on a Readiness Planning and Review Checklist. Identify preparatory activities not applicable to the fieldwork with the label n/a (designating not applicable) or D for deferred.
- Assign each applicable preparatory activity by entering the names of participants in the Activity Assigned to column.
- The responsible person verifies that the activity is complete by putting their name in the Completed and Verified by column (e.g., QII, SMO, training).
- The PL enters the date the activity was completed.
   Note: Date Closed cannot be later than the date of the Readiness Review Meeting.
- Input notes, objective evidence, or other information as needed in the Notes Section.

## 1.0 General (Checklist Section 1)

- a) Enter Facility Hazard Categorization as required by LIR 300-00-05 in the notes section.
- b) Enter level of laboratory readiness review (e.g., MSA) as required by LIR 300-00-08, if applicable, in the notes section.
- c) Ensure that the activity scope is defined and approved (e.g., statement of work [SOW], work plan, installation work plan, integrated work document [IWD]). Enter the objective evidence, date, and title in the notes section, if applicable.
- d) Ensure the plan has been submitted to NMED (if required) for review. Before conducting sampling, ensure that NMED has approved the plan and that it addresses, as applicable, the site-specific sampling, core handling, and decontamination requirements. If NMED has not approved or otherwise provided a response to the submitted plan, the responsible PL and SWRC representative shall determine if a "proceed-at-risk" process is warranted and approved. Enter Objective Evidence in Notes section.
- e) Ensure that the applicable procedures are the correct revision and approved for issue in accordance with QP-4.5, Document Control.

Note: Fieldwork *is not* to proceed if procedures need revision and/or need to be developed.

(i–xi) Enter the unique identifier (e.g., SOP-07.05), revision number, and effective date of the applicable procedures (use the space provided in Section 13 if more entries are necessary).

Note: Notify the ENV-ECR Quality Program Project Leader (QPPL) of the need for development or adoption of any procedures by Subcontractors in order to complete this task. New procedures need to be completed and adopted prior to the completion of the Readiness Planning and Review Checklist.

f) Complete a Conduct of Operations Applicability Matrix in accordance with LANL LIR 310-00-00, Conduct of Operations and Section 4.0, LANL OST 310-00-00 Conduct of Operations; attach Matrix to the Readiness Planning and Review Checklist.

Note: The Conduct of Operations Applicability Matrix and Instructions and Guidance may found at PS-2 Conduct of Operations web page. <a href="http://ps.lanl.gov/ps2/excel/Conduct of Operations">http://ps.lanl.gov/ps2/excel/Conduct of Operations</a>
<a href="http://ps.lanl.gov/ps2/excel/Conduct of Operations">Applicability Matrix Template.xls</a>

## 2.0 Environmental and Cultural Protection (Checklist Section 2)

a) Use LIR 210-01-01, Site and Project Planning, to document, review and implement the Permits and Requirements Identification (PR-ID) process (i.e. to identify laws, regulations, and procedures that may need addressing for the field activity). Enter the PR-ID number in the notes section.

Note: Only significant changes to field activities (e.g., changing from surface sampling to drilling or encountering unexpected contaminants that were not addressed in the original questionnaire) require reinitiating the PR ID questionnaire process.

- b) If an environmental assessment is necessary, coordinate with LANL Ecology Group (ENV-ECO) personnel to conduct the assessment before starting fieldwork.
- c) Contact LANL Water Quality and Hydrology Group (ENV-WQH) if a Storm Water Pollution Prevention Plan (SWPPP) needs preparation or update.
- d) Contact LANL Meteorology and Air Quality Group (ENV-MAQ) if National Emission Standards for Hazardous Air Pollutants (NESHAP), is applicable.
- e) Contact ENV-WQH if National Pollutant Discharge Elimination System (NPDES), is applicable.

## 3.0 Health and Safety (Checklist Section 3)

- a) Ensure that the Health and Safety Plan (HASP) requirements are approved for use in the SSHASP. Enter Objective Evidence in the Notes section.
- b) Ensure that the SSHASP has been approved. Enter SSHASP title in the Notes section.
- c) Ensure applicable subcontractor Health and Safety (H&S) Program is approved for use. Enter Objective Evidence in the Notes section.
- d) Ensure establishment of medical monitoring, if applicable. Enter Objective Evidence in the Notes section.
- e) Ensure an Integrated Work Document and or JHA has been developed, reviewed, signed, and approved. Enter IWD Number in the Notes section.
- f) Contact ENV-ECR to have the signed and approved IWD, JHA ID number and tile (if applicable), and SSHASP on the ECR webpage.

#### 4.0 Waste Management (Checklist Section 4)

- a) Complete a Waste Characterization Strategy Form (WCSF) in accordance with SOP-01.10, Waste Characterization. Enter approved WCSF # and title in the Notes section.
- b) If on-site waste storage (including satellite accumulation and less-than-90-day accumulation) is necessary, notify LANL Solid Waste Regulatory Compliance (ENV-SWRC) to establish an on-site waste-storage area before conducting fieldwork. Enter Objective Evidence in the Notes Section.
- c) Assign a Waste Management Coordinator (WMC) to the activity in accordance with Section 7.0 of LS 105-01.0, Waste Management Coordinator Program. Enter the name of the WMC, employer and phone number in the Notes section.
- d) Assign a Waste Generator to the activity. Enter the name of the Waste Generator in the Notes section.
- e) Ensure that all generated wastes have a disposal path (see LIR 404-00-02.2, General/Waste Management Requirements). Enter Objective Evidence in the Notes section.
- f) If applicable, ensure approval for generating waste with no disposal path. Enter Objective Evidence in the Notes section. If n/a, enter "all waste generated has a disposal path."

## 5.0 Training (Checklist Section 5)

a) Ensure that before conducting fieldwork, field team members, including personnel who conduct oversight activities, are trained as required in the SSHASP and IWD and QP-2.2, Personnel Training Management. Enter objective evidence in the Notes section.

Note: Since SSHASP and IWD training may take place after the readiness planning and review meeting, but prior to any fieldwork being performed; the PL may elect to select D for deferring the activity and noting that the SSHASP and IWD training will be conducted and documented prior to the start of fieldwork.

Training in areas such as the following will be documented in the Notes section as appropriate:

(i) Training to Laboratory documents such as LIRs, Laboratory Implementation Guidance (LIGs), and Laboratory Performance Requirements (LPRs), and ENV-ECR documents such as standard operating procedures (SOPs) and QPs, subcontractor quality program and applicable procedures.

- (ii) Site-specific training such as the Resource Conservation and Recovery Act (RCRA) (including less than 90 day storage area), RCRA Facility Investigation (RFI) Work Plan, site-specific work plan, and technical-area (TA)-specific procedures.
- (iii) Quality orientation and training in accordance with QP-2.2, Personnel Training Management, is required of all participants including subcontractors working under the ENV-ECR Quality Management Plan.
- (iv) Site-access training in accordance with specific technical area.
- (v) LANL Integrated Work Management specific training.

Note: Ensure that training requirements for support organizations is also up to date (e.g., Waste Management Coordinator, Waste Generator)

b) Copies of training documents need to be placed in the Records Processing Facility (RPF) per QP-4.4, Records Transmittal to the Records Processing Facility. Enter Objective Evidence in the Notes section.

Note: Training for personnel arriving to do work on any ENV-ECR site—post readiness review—will be performed per QP-2.2, Personnel Training Management.

The PL may request assistance from the training specialist to verify training documentation for training records by submitting a written request and a site-specific training matrix for all personnel whose training is to be verified per QP-2.2.

#### 6.0 Work Requests and Permits (Checklist Section 6)

Note: As required, contact the Laboratory Operation and Maintenance contractor, to obtain work requests and/or permits for the following site activities:

- a) Fencing (if required): obtain work requests or service requests in accordance with LIR 230-03-01.5, Facility Management Work Control, for fence work (e.g., fence cutting or fence repair) on Laboratory property. Enter Objective Evidence or Permit # in Notes section.
- b) Excavation or Fill: If an excavation or fill permit is needed, contact the Engineering Technical Coordinator in accordance with LIR 402-880-01.0, Soil Disturbance Permit Process. Excavations require personnel to go into the web site <a href="http://esh-id.lanl.gov/excavation/index.asp">http://esh-id.lanl.gov/excavation/index.asp</a> and fill out an Index of Excavation/Soil Disturbance Permit Request. Health, Safety and Radiation Protection personnel review these requests.

For work in areas where the subsurface will be disturbed, ensure that on-site underground utilities (including Los Alamos County utilities on non-DOE

- property) such as gas, electric, cable, and telephone lines are located and marked. Enter Objective Evidence or Permit # in Notes section.
- c) Confined Space: If work is performed in a confined space, evaluate the confined space and, if required, obtain a confined-space work permit in accordance with LIR 402-810-01.0, Confined Spaces. Enter Objective Evidence or Permit # in Notes section.
- d) Radiation: When radioactive material or contamination is identified at the site, obtain a radiological work permit in accordance with LIR 402-701-02, Radiological Access Control. Enter Objective Evidence or Permit # in Notes section.
- e) Spark/Flame Production: When welding, cutting, and or using other spark- or flame-producing equipment or operations are required, obtain a burn/hot work permit in accordance with AR 8-4, Welding, Cutting, and Other Spark-/Flame-Producing Operations. For example, engines such as chain saws, generators, and other potential spark-producing equipment require the burn/hot work permit. Enter Objective Evidence or Permit # in Notes section.
- f) Obtain safety work permits (as appropriate): Enter Objective Evidence or Permit # in Notes section.

## 7.0 Support and Equipment (Checklist Section 7)

- a) Before field mobilization, request and obtain support services (e.g., drill-rig or backhoe procurements, fence installments, electrical hook-up installments, sanitation facilities, communication equipment) to allow the supporting organization to schedule the services or equipment. Enter Objective Evidence in Notes section (e.g., List Support Services in Notes section if applicable).
- b) Schedule survey teams for on-site activities if applicable. Enter Objective Evidence in Notes section.
- c) Identify all subcontractors who will perform work on the activity. Enter Objective Evidence in Notes section. (e.g., list Subcontractors in Notes section if applicable).
- d) Verify that all subcontractors, vendors, suppliers, and analytical laboratories who will perform work on the activity have implemented an approved quality program equivalent to the ENV-ERS Quality Management Plan (QMP) or that they are working under the ENV-ERS QMP or the Subcontractor's quality program has been approved by the Quality Program Project Leader (QPPL). Have the QPPL ensure by e-mail or in writing. Enter Objective Evidence in Notes section.
- e) Ensure that the subcontractor, vendor, supplier, and/or analytical laboratory planned for use is verified as approved on the ENV-ECR Qualified Suppliers

- List (QSL). Subcontractors working under their own quality program shall implement this requirement in accordance with their quality program. Have the QPPL ensure by signing in the completed and verified column. Enter Objective Evidence in Notes section.
- f) Obtain the necessary communications equipment (e.g., radio, cell phone). Enter Objective Evidence in Notes section.
- g) Obtain the necessary sampling and survey equipment and supplies. Enter Objective Evidence in Notes section.
- h) Obtain the necessary health and safety (H&S) equipment and supplies. Enter Objective Evidence in Notes section.
- i) Ensure that copies of the correct versions of the applicable working documents (e.g., Health and Safety Plan, QPs, SOPs, and their associated forms) are readily available for use. Enter Objective Evidence in Notes section.
- j) Perform scheduled QII oversight. Have the quality specialist sign in the completed and verified column.

## 8.0 Sampling and Analysis Plan/Sample Management Office (Checklist Section 8)

- a) Ensure field sampling paperwork has been requested and received by the field team (refer to action step 6.3 for specific readiness planning requirements). Enter Objective Evidence in Notes section.
- b) Ensure that the 15-day notification has been sent to NMED. The **PL or designee** shall notify the NMED at least fifteen calendar days before the start
  of sampling activities and/or work plan implementation. If collection of
  environmental samples is required, the PL will make notification at least 15
  calendar days before the start of sampling activities. If the sampling activities
  do not happen within 15 days of the Readiness Review Meeting, the activity
  can be Deferred on the Checklist, as long as the PL ensures the period is met
  prior to sampling. Enter Objective Evidence in the Notes section.

## 9.0 Laboratory and Site Access (Checklist Section 9)

- a) Ensure site access is coordinated with the appropriate personnel within the facility management in accordance with QP-5.4, Obtaining Access Agreements for Non-DOE-Owned Property, for sites that require access agreements, special security requests, landowner permission, or county notice, if applicable. Enter Objective Evidence in Notes section.
- Ensure access agreements, facility-tenant agreements, and/or other permissions are obtained. Enter Objective Evidence in Notes section (i.e., enter FTA title and number).

- Ensure site control and security is planned and arranged. Enter Objective Evidence in Notes section (e.g., describe the fencing or other means for controlling the site access).
- d) Before the start of fieldwork, ensure that all field-team members are issued Laboratory identification badges, if applicable.

Note: Since Laboratory identification badges may be issued after the Readiness Planning and Review Meeting, but prior to any fieldwork being performed, the PL may elect to select D for deferring the activity and noting that the appropriate badges will be issued for all personnel prior to the start of fieldwork. Enter Objective Evidence in the Notes section.

### 10.0 Notifications (Checklist Section 10)

- a) To document consensus that fieldwork may proceed, notify the following individuals of the location, date, and time of the readiness planning and review meeting. Enter the representative's name in the Notes section for each of the following:
  - i Each ENV-ECR worker assigned a preparatory activity.
  - ii The Health, Safety, and Radiation Protection oversight representative
  - iii The EM&R oversight representative
  - iv The ENV-ECR quality specialist
  - v The ENV-ECR QPPL
  - vi The affected facility manager(s)
  - vii The SMO-lead
  - viii The ENV-ECR group leader
  - ix The appropriate DOE representative (ten days prior to conducting the readiness, planning and review meeting)
  - x The ENV-ECR SWRC representative
  - xi The Subcontractor Quality Program representative
  - xii Nuclear Facility Safety Authorization Basis reviewer (i.e., safety basis reviewer)
- b) Before the start of fieldwork, the communications and outreach specialist should obtain task activity information from the PL, designee, and/or the chairman prior to attending the meeting. The communications and outreach specialist shall use this information to inform, as necessary, Los Alamos County, non-DOE property owners, and the public. Enter Objective Evidence in the Notes section.

#### 11.0 Other (Checklist Section 11)

Use this section to address preparatory activities (e.g., new action items or information from other sections) applicable to unidentified fieldwork on Attachment A (e.g., procedures, other documents, assignments etc.).

## 12.0 Verification of Closure (Checklist Section 12)

At the completion of the readiness planning and review meeting, the responsible PL, or designee, the assigned quality specialist, the SMO-lead, the assigned training specialist, the SWRC representative, the safety basis reviewer, and the RLM shall attest to the completion of the readiness planning and review process by signing the checklist in accordance with this quality procedure.

Project Leader: Work Eler					Readines		
Project Title:							
Description of Field Activity:							
Preparatory Activity Des	cription	A, D, or n/a	Activity Assigned to	Completed and Verified by	Date Closed	Notes / Objective Evidence	
1) General							
a) Enter facility hazard categorization     Laboratory Implementation Requi							
b) Enter level of Laboratory Readiness LIR 300-00-08)	s Review in Notes (see						
c) Activity's scope is defined							
d) Work plan approval obtained from t Environment Department (NMED)							
e) Applicable procedures are correct/a	pproved (List ↓)						
i)							
ii)							
iii)							
iv)							
v)							
vi)							
vii)							
viii)							
ix)							
x)							
xi)							
f) Conduct-of-Ops Followed							
2) Environmental and Cultural Pro	tection						
a) Permits and Requirements Identific	cation (PR ID) approved						
b) Categorical exclusion applicable (N	NEPA)						

KEY: Preparatory Activity Description: Entry that identifies the activity. Activity Applicability (A, D, or n/a): Entry that verifies whether the activity is applicable or not. Items identified in the checklist as "A" (for "applicable") are to be understood as being required. Any activity not appropriate at this time can be marked D for Deferred. Deferred (D): Entry and/or action item that was deferred for completion later. All checklist line items that are not applicable must be addressed by entering n/a. Activity Assigned to: Entry that identifies the individual and/or organization responsible for completing and/or ensuring that the activity has been completed. Completed (Completion required for some applicable activities): Entry that identifies if the activity has been completed. Date Closed: Date the activity was completed or verified completed. Notes/Objective Evidence: Entry that addresses additional information resulting from the readiness planning and review meeting or objective evidence supporting completed activity.

Los Alamos National Laboratory ENV-ECR

Readiness Planning and Re	<u> </u>	ricokiist			,			
oject Leader: Work Element:		Readiness Planning and Review Meeting Date:						
oject Title:								
escription of Field Activity:	T	1						
Preparatory Activity Description	A, D, or n/a	Activity Assigned to	Completed and Verified by	Date closed	Notes / Objective Evidence			
2) Environmental and Cultural Protection—(cont.)								
b) Categorical exclusion applicable—(cont.)								
c) Storm Water Pollution Prevention Plan (SWPPP)								
d) Natl. Emissions Stds. for Hazardous Air Pollutants (NESHAP)								
e) National Pollutant Discharge Elimination System (NPDES)								
<li>f) Solid Waste Regulatory Compliance (SWRC) review of work documents complete</li>								
3) Health and Safety								
a) HASP requirements addressed in SSHASP								
b) Site-specific health and safety plan (SSHASP) approved								
c) Subcontractor health and safety (H&S) program approved								
d) Medical monitoring established								
<ul> <li>e) Integrated Work Document (IWD) developed and or activity Job Hazards Analysis (JHA) approved.</li> </ul>								
<li>f) Copy of signed IWD, JHA (if applicable), and SSHASP on ECR Webpage</li>								
g) H&S oversight activity scheduled								
4) Waste Management								
a) Waste Characterization Strategy Form approved								
b) On-site waste storage area established								
c) Waste management coordinator assigned								
d) Waste generator assigned								
<ul> <li>e) Does all waste to be generated have a disposal path? (see LIR 404-00-02.2)</li> </ul>								
f) Approval obtained to generate waste with no disposal path								
5) Training								
a) Field team (including QII) is trained as required:								
i) LANL & ERS documents (e.g., LIRs, LIGs, LPRs, and IMPs)								

roject Leader: Work Element:			Readiness Planning and Review Meeting Date:					
Project Title:				•				
Description of Field Activity:								
Preparatory Activity Description	A, D, or n/a	Activity Assigned to	Completed and Verified by	Date Closed	Notes / Objective Evidence			
5) Training—(cont.)								
ii) Site-specific training								
iii) Quality orientation and training (QPs, SOPs, etc.)								
iv) Site-access training								
v) LANL IWM-specific training								
b) Training documents to Records Processing Facility (RPF)								
6) Work Requests and Permits								
a) Fencing								
b) Excavation or fill								
c) Confined spaces								
d) Radiation								
e) Spark-/flame-production								
f) Safety work permits								
7) Support and Equipment								
a) Support services arranged								
b) Schedule survey team								
c) Subcontractors identified								
d) Subcontractors comply with ENV-ECR quality program								
e) Contractor/vendor/supplier/analytical laboratory verified as approved (see ENV-ECR QSL)								
f) Utilities identified and marked								
g) Communications equipment obtained								
h) Sampling and survey equipment and supplies obtained								
i) H&S equipment and supplies obtained								

Readiness Planning and Review Checklist for a non-NES (continued) Page 4 of 5								
Project Leader:	ig and i	Work Elemen		Readiness Planning and Review Meeting Date:				
Project Title:		WORK Elemen		reduite33 Fidili	ing and neview meeting bate.			
Description of Field Activity:								
Preparatory Activity Description	A, D, or n/a	Activity Assigned to	Completed and Verified by	Date Closed	Notes / Objective Evidence			
7) Support and Equipment—(cont.)								
j) Copies of applicable working documents available at the site								
k) QII oversight activity scheduled								
8) Sampling & Analysis Plan/Sample Management Office								
a) Draft field paperwork requested and received by field team								
<ul> <li>b) 15 day notification sent to NMED (may be deferred based on timing of sampling)</li> </ul>								
9) Laboratory and Site Access								
a) Site access coordinated								
b) Access agreement and other permissions obtained								
c) Site control and security planned and arranged								
d) Laboratory badges issued								
10) Notifications								
a) Readiness Planning and Review Meeting notification								
i) ENV-ECR workers assigned prep. activities								
ii) Health, Safety, and Radiation Protection (HSR) oversight representative								
iii) EM&R oversight representative								
iv) ENV-ECR Quality Specialist								
v) ENV-ECR QPPL								
vi) Affected facility manager(s)								
vii) Sample Management Office (SMO) Lead								
viii) ENV-ECR Group Leader								
ix) DOE/NNSA LASO Representative								
x) Data Analysis and Assessment Team Leader								
xi) SWRC representative								

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Readiness Plannin			-	•		
,	ork Element:		Read	iness Pianning	g and Review Meeting	д рате:
Project Title:						
Description of Field Activity:			1			
Preparatory Activity Description	A, D, or n/a	Activity Assigned to	Completed and Verified by	Date Closed	Notes / Obj	ective Evidence
xii) ENV-ECR C&O project representative						
xiii) Subcontractor Quality Program representative						
xiv) Nuclear Facility Safety Basis reviewer						
xv) ENV-ECR training specialist						
11) Other (list below):						
<del>_</del>						
12) Verification of Closure I verify that all preparatory activities necessary for initiating this Responsible Line Manager  Project Leader, designee or Chairman		ed. int name, then sigr	n)			(Date)
Quality Specialist	(Pr	int name, then sigr	1)			(Date)
Sample Management Office Lead	(Pri	nt name, then sign	)			(Date)
Training Specialist	(Pr	int name, then sigr	۱)			(Date)
SWRC Representative	(Pr	int name, then sigr	1)			(Date)
Safety Basis Reviewer	(Pr	int name, then sign	n)			(Date)
QP-5.3, R4					Los Alamos Na ENV-ECR	tional Laboratory

## **Attachment C**

# **Readiness Planning and Review Meeting Attendance List** Project Leader: Work Element: Date: Project Title: Description of Field Activity: Printed Name Organization E-Mail Phone No. Signature Los Alamos National Laboratory QP-5.3, R4 **ENV-ECR**